

**Illinois Commerce Commission**  
**Pipeline Safety**  
**Pipeline Safety Report**

<b>Operator: PEOPLES GAS LIGHT AND COKE CO.</b>	<b>Operator ID#: 15329</b>
<b>Exit Meeting Contact: Glannie Chan</b>	<b>Total Man Days: 9</b>
<b>Pipeline Safety Representative(s): Aaron McElravy, Steve Canestrini</b>	
<b>Company Representative to Receive Report: Tom Webb</b>	<b><u>Emailed Date:</u></b>
<b>Company Representative's Email Address: TJWebb@peoplesgasdelivery.com</b>	06/19/2014

**Inspection Summary**

<b>Inspection Type</b>	<b>Location</b>	<b>ICC Analyst</b>	<b>Inspection Unit(s)</b>	<b>Man Day(s)</b>	<b>Inspection Date(s)</b>	<b>Contact(s)</b>
Standard Inspection - Record Audit	Chicago	Aaron McElravy, Steve Canestrini	G.O. Transmission, G.O.	9	5/13/2014, 5/14/2014, 5/15/2014, 5/27/2014, 5/28/2014	Adam Wandycz, Carol Schafer, Deborah Hozzian, Eddie Morrow, Fabian Beltran, Glannie Chan, Harsh Mehta, Juan Santiago, Kamara Smith, Mark Lempicki, Matthew Krecun, Ray Deatherage, Richard Mosar, Robert Mirabal

**Statement of Activities**

On May 13-15 and May 27-28, 2014, Staff conducted a Record Audit to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. Staff inspected 2013 records maintained at the General Office Building for CY 2013 including customer notification, surveillance of cast iron pipelines, odorization, testing requirements, abandonment and deactivation of facilities, MAOP, Overpressure Protection and validation of Potential Impact Radius Calculations ("PIR"). Records reviewed included as-built drawings, construction records, main maintenance tickets, service tickets, odorization rates and various electronic and paper records maintained to meet compliance. During the review of the construction records, Staff discovered gaps in PGL's procedures for pressure testing. Staff identified charts that displayed variations in pressure including increasing and decreasing due to temperature. The charts identified maintained constant pressure for the duration of the test due to the extended length indicating an adequate test. Staff has issued a Notice of Amendment ("NOA") as a result of the audit to address initial stabilization, temperature change resulting in pressure fluctuation and the determination of acceptable limits to validate the test to ensure leakage does not exist. Staff also opened an issue due to concerns the electronic and paper tickets were not capturing testing the final tie, the procedures located in General Order 3.000 Section IV and V require tie in joints be soap tested at distribution pressure. Proper records regarding leak testing must be maintained to meet compliance with Part 192.517. Once PGL modifies the form to capture documentation, Staff will determine if adequate.

Staff was provided an update regarding issue # 2014-S001-00002 on May 28, 2014, regarding the tracking of various joining records for Contractor and PGL employees who are qualified, re-qualified, or no longer working on PGL's pipeline. Staff will review the tracking process when complete and functioning to determine if adequate.

An update was also provided regarding the as-built process and prioritization matrix for meeting compliance. This process was implemented in 2013 to track tickets for completion and missing or incorrect ticket information. This update was provided in

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association with quarterly updates provided by PGL in accordance with 192.725. Staff will continue to monitor PGL's progress to meet and maintain compliance.

This will conclude the 2013 Record Audit for Peoples Gas Light and Coke Company, additional information regarding this audit can be obtained from the applicable checklist and attached documents. Staff also inspected 2013 records during the Division Street and Tech Training Audit completed on January 31, 2014. Details regarding that audit can be obtained from inspection # 2014-P-00032.

#### **INSPECTION FINDINGS**

##### **Standard Inspection - Record Audit**

###### **Issues(s) Found:**

**[192.503(d)]** - Staff has concerns the pressure testing records do not capture addressing leak testing the final tie in using operating pressure. This would apply to temporarily disconnected piping and cut-offs requiring a leak test not less than the operating pressure.

###### **Notice Of Amendment(s) Found:**

**[192.13(c)][192.509(a)]** - The O&M fails to address fluctuation in test pressures due to changes in temperature and does not clearly determine a process for validation. Staff discovered pressure recording charts that had minor fluctuations which were noted they were due to temperature change. The O&M does not address the allowable limits or define a process for calculation to validate they are from temperature change and not a potential leak. Staff determined the charts identified did maintain stabilized pressure for the required time intervals listed in General Order 3.000, Section 5 and the tables listed in Section 6. Staff has concerns without adequate procedures for addressing stabilization, fluctuation, and validation of variation all potential leaks may not be identified.

###### **Notice Of Violation(s) Found:**

**[NO NOPVS FOUND]**

#### **PAST INSPECTION FINDINGS**

###### **Issue(s) Corrected:**

**[NO ISSUES CORRECTED]**

###### **Notice Of Amendment(s) Corrected:**

**[NO NOAS CORRECTED]**

###### **Notice of Violations(s) Corrected:**

**[NO NOPVS CORRECTED]**